

of the allegations contained in the second sentence of Paragraph 12 and they are denied for that reason. The third sentence of Paragraph 12 contains legal conclusions does not require a response.

3. Parkcrest admits the allegations in the first sentence of Paragraph 13. Parkcrest lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in the second sentence of Paragraph 13 and they are denied for that reason. The third sentence of Paragraph 13 contains legal conclusions does not require a response.

4. Paragraphs 14 through 19 contain legal conclusions to which no response is required.

II. **AFFIRMATIVE DEFENSES**

5. Assuming any violations are ultimately found to exist, which is denied, any deviations from the applicable guidelines are de minimis and within construction and/or manufacturing tolerances.

WHEREFORE, PREMISES CONSIDERED, Parkcrest prays that GV Multi-Family, LLC take nothing by its suit, that Parkcrest have and recover its costs and attorney's fees and that Parkcrest have such other and further relief as to which it may show itself justly entitled.

Respectfully submitted,

/S/ ROBERT G. BAILEY

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ATTORNEY FOR PARKCREST

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and furnished a true and correct copy of the foregoing by U.S. Mail to:

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/S/ ROBERT G. BAILEY

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